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June 6, 2018

VIA ECF

Honorable Magistrate Judge Ramon E. Reyes, Jr
United States District Court, EDNY

RE: Bonikos et al v. 50 Front Street Enterprises, Inc., 1:17-cv-06076-ARR-RER

Dear Honorable Judge,

I represent Plaintiffs Yannis Bonikos and Rigel Shaholli (the “Plaintiffs”) in the above-referenced action. I write with the consent of Defense counsel to request an extension of time to complete discovery.

Defendants’ deposition has been scheduled for June 13th but, unfortunately, because of my departure from the law firm of Varacalli & Hamra, LLP at the end of this week, this office is seeking to adjourn Defendants’ deposition for 30 days. Because the discovery deadline is set to close on June 14, 2018, any adjournment of Defendants’ deposition will require the Court’s approval, and an Order from Your Honor extending the discovery deadline. The partners of this firm require this additional time to find an attorney to replace your undersigned and/or to review the relevant facts and case law in this case in order to conduct the deposition of Defendants themselves.

Accordingly, the parties respectfully request a 30 day extension of the discovery deadline to complete Defendants’ deposition and to respond to any follow-up document discovery that may be sought after each litigant’s deposition.

Thank you for your time and consideration.

Truly Yours,

/s/ Salim Katach
Salim Katach (SK0924)